REMARKS

Applicants submit that Paragraph [0017] of the Specification and independent claims 1, 8, and 16 have been amended. Support for the changes to Paragraph [0017] and claims 1, 8, and 16 can be found in the drawings, as originally filed. Specifically, it can be seen from **FIGS. 1 and 4** that the **color filter is both on and adjacent to the substrate** (Emphasis added.) of the light guide plate. Claims 4 and 11 have also been amended for appropriate dependency.

Claim Rejections - 35 USC §103

Claims 1, 2, 4-9, and 11-17 are rejected under 35 U.S.C. 103(a) as being unpatentable over Kalmanash (US 5,211,463) in view of Blankenbecler et al. (US 6,104,446).

In response to the rejection of claims 1, 2, 4-9, and 11-17 under 35 U.S.C. 103(a) as being unpatentable over Kalmanash (US 5,211,463) in view of Blankenbecler et al. (US 6,104,446), Applicants have amended claims 1, 8, and 16 and hereby otherwise traverse this rejection.

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Claim 1 recites in part:

> ...a color filter disposed on and adjacent to the emitting surface, the color filter comprising a color layer for a full color display...

Similarly, claim 8 recites in part:

> ...a color filter disposed on and adjacent to the emitting surface, the color filter comprising a color layer for a full color display...

Likewise, claim 16 recites in part:

> ...a color filter is ... adjacent to the emitting surface of the light guide plate.

Applicants submit that such a light guide plate as set forth in claims 1, 8 and 16, is neither taught, disclosed, nor suggested by Kalmanash '463, Blankenbecler '446, or any of the other cited references, taken alone or in combination.

The Examiner admitted that Kalmanash '463 fails to disclose a color filter disposed on and adjacent to the emitting surface of the light guide

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plate. On the contrary, Kalmanash '463 teaches "[A] diffuser plate 56 is placed at the front surface 58 of the edgelit panel to enable good uniformity of light transmission from the day lamps 42 ..." (FIG. 3; Column 5, lines 62-64). Therefore, Applicants submit Kalmanash '463 teaches away from disposing a color filter **on and adjacent to the emitting surface** of the light guide plate (Emphasis added.). Specifically, the proposed modification would require relocating the diffuser plate 56 from the front surface 58 of the panel, and it has been held, as set forth at MPEP §2143.01, that a proposed modification cannot render the prior art unsatisfactory for its intended purpose (i.e., enabling uniform light transmission).

Blankenbecler '446 does disclose a color separation plate 12. However, a color separation plate 12 as taught by Blankenbecler '446 is not a color filter at all. One of ordinary skill in the art should understand that a color filter obtains R, G, B lights by selectively filtering (absorbing or reflecting) the unwanted bandwidth from the white light respectively. For example, when a white light passes through a color filter or R pixel, the light bandwidths of green and blue are filtered and only red light is

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selectively allowed to pass therethrough. As to the color separation plate 12, it obtains R, G, B lights by separating a white light into three by optical prisms. Therefore, there is no light filtered at all, and as such, the color separation plate 12 is not a color filter, as set forth in claims 1, 8 and 16.

Further, Blankenbecler fails to teach, suggest or disclose, as per claims 1 and 8, "a color filter comprising a **color layer** ..." (Emphasis added.). Blankenbecler teaches three distinct sections of specific geometries of the color separating plate 12 (FIGS. 1-5A), none of which are indicated to be a color layer. Further, Applicant submits that none of the three sections has a layer geometry. Therefore, Blankenbecler fails to teach or suggest a color layer, as required in claims 1 and 8, and, thus, fails to overcome the shortcomings associated with Kalmanash '463.

Furthermore, Blankenbecler teaches "a white light source 9 generated **well-collimated** white light ... directed toward the color separation plate 12" (Column 9, lines 34-37; Emphasis added.). One of ordinary skill in the art should understand that the principle of microprisms for color separation is related to the incident direction, and

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white light incident from a variety of directions results in distorted color lights. Therefore, the white light source 9 should provide well-collimated white light to the color separation plate 12 for color separating, according to the operating principle of the color separation plate 12 (i.e., microprisms). However, according to Kalmanash '463, the light provided from the front surface 58 of the edgelit panel is to be diffused to promote uniformity (Paragraph 0023). As diffused light is essentially the antithesis of collimated light, there is no reasonable expectation of success to combine or to modify Kalmanash '463 with a color separation plate, as set forth in Blankenbecler '446.

According to the reasons discussed above, Applicants submit that the present invention, as set forth in claims 1, 8 and 16, is novel and unobvious over Kalmanash '463, Blankenbecler '446, or any of the other cited references, taken alone or in combination, and thus claims 1, 8, and 16 should be allowable.

Reconsideration and withdrawal of the rejection and allowance of claims 1, 8, and 16 are respectfully requested.

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Claims 2 and 4-7 depend from claim 1; claims 9 and 11-15 depend from claim 8; and claim 17 depends from claim 16, and, therefore, such claims should also be allowable.

Claims 3 and 10 are rejected under 35 U.S.C. 103(a) as being unpatentable over Kalmanash in view of Blankenbecler, and in further view of Sawada (US Patent No. 6,649,952).

In response thereto, claims 3 and 10 depend from allowable claims 1 and 8, respectively, and, therefore, should also be allowable.

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Conclusion

For all the above reasons, Applicant asserts that all the pending claims are now in proper form and are patentably distinguishable over the prior art. Therefore, Applicant submits that this application is now in condition for allowance, and an action to this effect is earnestly requested.

Respectfully submitted,
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